

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.
Luis Abraham Martinez (1987/US)
(NC 09/08/2022)

Case No. 7:22-mj-1750

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2022 in the county of Nueces in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC § 1956(h)

Offense Description

Conspiracy to Commit Money Laundering, in violation of 18 USC § 1956(a)
(2)(B)(i) and 18 USC § 1956(a)(2)(B)(ii)

United States District Court
Southern District of Texas
FILED

SEP 02 2022

Nathan Ochsner, Clerk

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Roberto Lopez

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

Date: 9/2/22 - 8:29 a.m.

City and state: McAllen, Texas

/s/ Nicholas C. Stott

Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Judge's signature

U.S. Magistrate Judge Juan F. Alanis

Printed name and title

Attachment "A"

1. On September 1, 2022, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance as part of an ongoing investigation from the Robstown Police Department in Robstown, Texas. Nueces County law enforcement officers detained Luis Abraham Martinez (hereinafter MARTINEZ), a citizen of the United States, the driver and sole occupant of a passenger car, while traveling southbound on US Highway 77 in Nueces County, Texas.
2. MARTINEZ was stopped on US Highway 77 for committing a traffic violation. During the course of the traffic stop, MARTINEZ consented to a search of the vehicle.
3. A subsequent search of the vehicle revealed two packages of a substance which weighed approximately 1.5 kilograms were located concealed within an aftermarket constructed concealed compartment in the rear bumper area of the vehicle. The substance inside the packages field tested presumptive positive for the properties and characteristics of methamphetamine. A plastic bag containing a large sum of United States currency, estimated to be in excess of \$10,000.00 was located concealed within the door of the vehicle.
4. As part of an ongoing investigation, a HSI SA from McAllen, Texas responded to assist in the investigation. The HSI Special Agent (SA) interviewed MARTINEZ who stated he was hired by an unknown person in Mexico to transport US currency from the United States into Mexico. MARTINEZ stated he expected to be paid for the smuggling event. MARTINEZ stated he had smuggled currency from the United States into Mexico on two previous occasions within the last three months. MARTINEZ stated he knew the currency reporting requirements upon departing the United States into Mexico, and he had never reported the currency and did not intend to report the currency on today's date. MARTINEZ stated he knew the currency concealed within the vehicle were proceeds from distribution quantities of illicit controlled substances. MARTINEZ stated he intended on transporting the US currency into Mexico on today's date through the Hidalgo Port of Entry in Hidalgo, Texas. MARTINEZ claimed he was not aware he would be transporting drugs, only drug proceeds.